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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**CHERRY ALI**, an individual, formerly  
d/b/a TAWAKAL GROCERY HALAL,

Plaintiff,

v.

**UNITED STATES OF AMERICA,**

Defendant,

Case no. 3:17-cv-577-MO

**JOINT MOTION FOR  
EXTENSION OF EFFECTIVE  
DATE OF DISMISSAL ON  
BASIS OF SETTLEMENT**

*Expedited Consideration & Ruling  
Respectfully Requested*

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Pursuant to Fed. R. Civ. P. 6(b) and LR 7-1, Plaintiff and Defendant hereby jointly and respectfully move for a further 21-day extension in the effective date of the Order of Dismissal (Dkt. #18) that the Court entered on Mar. 28, 2018, in response to notice that Plaintiff's counsel provided pursuant to LR 41-1(a) that the parties had reached a substantial agreement on the terms and conditions of a settlement. In that order, the Court dismissed this action with prejudice and without costs and with leave, upon good cause shown initially within sixty (60) days, for the parties to seek the setting aside of its order of dismissal and reinstatement of this action if the

settlement were not consummated within that period. The parties now jointly move to extend the effective date of that original order of dismissal by another three weeks, up to and including Sept. 21, 2018. Since the last request they made in this vein, the parties have nearly finalized the language of a draft of the settlement, but need a few more days to complete that endeavor, and then undersigned counsel for Defendant will need to secure the necessary authority from an appropriate official within the Department of Justice before he can execute the agreement on behalf of the United States.

In light of the foregoing, Plaintiff and Defendant hereby respectfully submit that good cause exists for the relief sought by this motion and therefore respectfully request the Court to extend the effective date of dismissal in this action by another 21 days, to Sept. 21, 2018.

Jointly and respectfully submitted this 4th day of September 2018.

s/ Conrad L. Zubel  
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Zubel Law Offices, P.C.  
Attorney for Plaintiff

s/ Stephen J. Odell  
STEPHEN J. ODELL  
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